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November 3, 2014

## <u>VIA ELECTRONIC FILING AND</u> <u>OVERNIGHT DELIVERY</u>

The Honorable Jocelyn G. Boyd
Chief Clerk / Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29211

RE: Duke Energy Progress, Inc.'s 2014 Integrated Resource Plan and North Carolina 2014 REPS Compliance Plan –

Motion for Confidential Treatment

Docket Number 2014-8-E

Dear Mrs. Boyd:

Pursuant to S.C. Code § 58-37-40, I enclose Duke Energy Progress, Inc.'s ("DEP" or the "Company") 2014 Integrated Resource Plan ("2014 IRP"), 2014 Renewable Energy and Energy Efficiency Portfolio Standard ("REPS") Compliance Plan for North Carolina, and DEP's most recent FERC Form 715, for filing in connection with the above reference matter.

Portions of the 2014 DEP IRP and 2014 REPS Compliance Plan contain certain confidential information that should be protected from public disclosure. Table C-1 of Appendix C, page 70, contains a list of the Company's wholesale contracts and related commitments. Pages 107 through 109 of Appendix F of the IRP contain busbar screening curves which represent the confidential and proprietary levelized all-in costs of new supply-side resources, which include capital, operations and maintenance costs and fuel costs. Appendix H, Table H-1 and H-2 pages 121 through 122, contains wholesale sales contracts, firm wholesale purchased power contracts and non-utility generation contracts. In the NC REPS Compliance Plan, Part IV Table 2, Current and Projected Avoided Cost Rates Table, page 173 contains current and projected avoided cost rates; and, Exhibit A, pages 175 through 182, of the North Carolina 2014 REPS Compliance Plan contains names of counterparties with whom DEP has contracted for Renewable Energy Certificates ("RECs") and estimated RECs. Public disclosure of this information would harm DEP's ability to negotiate and procure cost-effective purchases and discourage potential bidders from participating in requests for proposals.

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In addition, the filing contains DEP's most recent FERC Form 715. Because the FERC Form 715 contains critical energy infrastructure information that should be kept confidential and non-public, DEP is also filing it under seal and requests that the Commission treat this information as confidential and protect it from public disclosure.

Accordingly I am filing these documents under seal; they should be treated confidentially Order No. 2005-226, "ORDER REQUIRING **DESIGNATION** pursuant to CONFIDENTIAL MATERIALS" and 26 S.C. Code Ann. Regs. 103-804(S)(2)(Supp. 2013) and under the Freedom of Information Act, S.C. Code Ann. § 30-4-10 (2013) et seq. and protected from public disclosure. I also enclose a public version of the 2014 IRP and North Carolina 2014 REPS Compliance Plan with the confidential information redacted. A copy of the CONFIDENTIAL VERSION of the documents filed herein are being mailed to the South Carolina Office of Regulatory Staff.

Please consider this correspondence as Duke Energy Carolinas' Motion for Confidential Treatment of the above-referenced information in Appendix C, Appendix F, Appendix H Tables H-1 and H-2, NC REPS Compliance Plan, Part IV Table 2, Exhibit A of the North Carolina REPs Compliance Plan, and the FERC Form 715 attached to the 2014 IRP.

Thank you for your consideration of this matter and please contact me with any questions.

Sincerely,

Timika Shafeek-Horton Deputy General Counsel

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**Enclosures** 

cc: Shannon B. Hudson, ORS

Jeffrey M. Nelson, ORS